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2012 SEP 17 PM 2:48
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

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United States of America

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$371,669.00 IN U.S. CURRENCY,

Defendant.

) NO. CV

CV 12-7999 PSG (AJWx)

) VERIFIED

) COMPLAINT FOR FORFEITURE

) [21 U.S.C. § 881(a)(6) and 18
) U.S.C. § 981(a)(1)(C)]

) [D.E.A.]

1 The United States of America brings this claim against the
2 defendant \$371,669.00 in U.S. currency ("defendant currency")
3 and alleges as follows:

4 JURISDICTION AND VENUE

5 1. This is a civil forfeiture action brought pursuant to
6 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(C).
7 This court has jurisdiction over the matter under 28 U.S.C.
8 §§ 1345 and 1355.

9 2. Venue lies in this district pursuant to 28 U.S.C.
10 § 1395(b).

11 PERSONS AND ENTITIES

12 3. The plaintiff is the United States of America.

13 4. The defendant in this action is \$371,669.00 in U.S.
14 currency.

15 5. The defendant currency was seized by Fontana Police
16 Department ("FPD") officers on or about April 6, 2012 during the
17 execution of a state search warrant at a residence on Revere
18 Court in Chino, California.¹ The interests of Yuzhen Xiang
19 ("Xiang"), Kevin Li ("Li"), and Danh Ho ("Ho") may be adversely
20 affected by these proceedings.

21 EVIDENCE SUPPORTING FORFEITURE

22 6. In April 2012 the FPD Narcotics Unit received
23 information that there was a residence on Homan Street in Chino,
24 California ("Homan residence") that was possibly being used to
25 cultivate marijuana. FPD was informed that the occupants of the
26 Homan residence were rarely seen, and if they were seen it was

27 ¹ All home addresses have been redacted pursuant to Local Rule 5-
28 4.3.2 and 5.2-1.

1 very late at night. The FPD was told that the occupants would
2 show up after dark, pull a van into the garage quickly and then
3 shut the garage door. After 30 minutes to an hour, the garage
4 would open and the van would leave.

5 7. On or before April 6, 2012, FPD Officer Janusz went to
6 the Homan residence and heard a humming noise coming from the
7 residence. The Homan residence was a two-story residence.
8 Based on his training and experience, Janusz associated the
9 humming noise with equipment commonly used to cultivate
10 marijuana such as fans, blowers and ventilation equipment.

11 8. When Officer Janusz walked to the front door of the
12 Homan residence he noticed that the front door was covered in
13 cobwebs and appeared to have never or hardly been used. He also
14 noticed there were a lot of dead bugs at the bottom of the
15 windowsill inside the windows of the residence. It also
16 appeared as though all the windows were covered from the
17 interior. Janusz could not see into the residence. At night,
18 Janusz could not see any visible light from any window of the
19 Homan residence. Janusz suspected that the windows may have
20 been completely covered from the interior. Marijuana
21 cultivators will often block the windows to control the light
22 directed at the marijuana plants to maximize the growth process
23 and prevent law enforcement from seeing the bright lights used
24 to cultivate the plants.

25 9. On the side of the Homan residence, Janusz observed a
26 small open window. Just inside the window there was a piece of
27 equipment that appeared to be sucking air into the house. The
28 screen to the equipment was covered with dead moths and bugs.

1 There was also a loud humming noise coming from the open window.
2 Marijuana cultivators will often try to increase the air
3 circulation around the plants to maximize the growth process.

4 10. Janusz contacted Jess Flores from Southern California
5 Edison. Flores told Janusz that he had looked at the electrical
6 bill for the Homan residence and determined that the electrical
7 usage had remained at a constant 26 KWH per day between November
8 2009 and April 2012. Flores told Janusz that the electrical
9 usage at the Homan residence was unusual because there was
10 usually fluctuation in the bill. Flores went to the Homan
11 residence and pulled the amperage to the home at the street.
12 Flores determined that the two lines running into the Homan
13 residence were registering 165.7 amps and 169 amps. According
14 to Flores, a normal house would use between 7 amps and 11 amps.
15 When Flores checked the meter for the Homan residence, it showed
16 1 KWH of usage. Flores told Janusz that there was likely a
17 bypass to the electric meter because the meter should have read
18 42 KWH of usage. Marijuana cultivators will often bypass the
19 electrical meter at the grow location to avoid paying the high
20 cost of electricity that is used in the process of operating an
21 indoor marijuana cultivation site.

22 11. During his surveillance of the Homan residence, Janusz
23 saw a silver Lexus SUV (with California license plate 6EDT239)
24 at the residence. The registration of the Lexus came back to a
25 residence on Revere Court in Chino ("the Revere residence"),
26 where Janusz also observed the Lexus.

27 ///

28 ///

1 12. On April 6, 2012, FPD obtained a state search warrant,
2 authorizing the search of the Homan residence and the Revere
3 residence.

4 13. On April 6, 2012, at approximately 8:00 p.m., FPD
5 officers first served the search warrant at the Homan residence.
6 No one was present at the Homan residence and a large indoor
7 marijuana cultivation operation was discovered. At least seven
8 rooms were set up to cultivate marijuana. Throughout the
9 cultivation rooms and elsewhere, officers observed grow light
10 systems, ballasts, fans and watering equipment commonly used in
11 the cultivation of marijuana. All of the windows to the Homan
12 residence were sealed off with drywall. Officers also
13 determined that there was an electrical meter bypass at the
14 location, which allowed the grow operators to steal electricity
15 for the grow operation. FPD officers seized 828 mature
16 marijuana plants (in the flowering or budding stage) and
17 approximately 160 pounds of dried marijuana from the Homan
18 residence.

19 14. FPD officers then served a search warrant at the
20 Revere residence. One of the occupants of the Revere residence,
21 Li, answered the door when officers arrived. FPD officers
22 entered the Revere residence and encountered Li's wife, Xiang,
23 and Ho, who was believed to be Li's mother. The occupants of
24 the Revere residence remained at the location while FPD officers
25 conducted a search of the home.

26 15. A search of the Revere residence was conducted and FPD
27 officers found several brown Home Depot boxes in the garage.
28 The boxes were opened and found to contain multiple clear,

1 plastic, air tight packages. Inside each of the plastic
2 packages was a green leafy substance believed to be marijuana.
3 A total of approximately 60 lbs. of marijuana was seized at the
4 Revere residence. The garage also contained several fans, a
5 type commonly used to dry marijuana. On the garage counter
6 officers found a vacuum sealing system. It appeared that the
7 marijuana contained in the Home Depot boxes had been sealed
8 utilizing a similar system. Inside the laundry room, officers
9 found a money counter on the countertop, \$69,669.00 in U.S.
10 currency (a portion of the defendant currency) in several
11 drawers, rubber bands for the U.S. currency, a digital scale,
12 pay/owe sheets (or informal ledgers utilized to keep track of
13 sales of narcotics) and additional dried marijuana in several
14 boxes on a shelf. In one of the upstairs bedrooms, officers
15 found an opened Pampers diaper box. Officers found several
16 clear air tight plastic packages containing U.S. currency inside
17 the diaper box. The currency in the diaper box was counted and
18 determined to be \$302,000.00 in U.S. currency (the balance of
19 the defendant currency).

20 16. FPD officer Au was called to the Revere residence to
21 assist with the interviews of Li, Xiang and Ho in the Chinese
22 language.

23 17. Li was interviewed and stated that a friend named
24 "Ken" dropped off all the marijuana at the Homan residence. Li
25 claimed that he did not know "Ken's" last name. Li stated that
26 they are just friends and that they go out to eat dinner from
27 time to time. Li stated that he had nothing to do with the
28 marijuana or the money found at either of the residences. Li

1 stated on several occasions that he did not own the defendant
2 currency.

3 18. Xiang was interviewed and stated that she owned all
4 the money and marijuana at both locations. Xiang further
5 admitted that all the money found during the search of the
6 Revere residence is from marijuana sales. Xiang admitted that
7 she sold marijuana to other Asian males, but claimed that she
8 did not know any of their names. Xiang claimed that she never
9 asks for the names of her marijuana customers. She stated that
10 "Ken" is her main contact, but claimed that she did not know how
11 to reach him. Xiang stated that they just meet up. Xiang
12 stated that she had been growing and selling marijuana since she
13 moved to the United States approximately a year earlier. Xiang
14 was advised that the defendant currency was located and seized
15 from various rooms in the residence including Ho's room. Xiang
16 stated that she put the money in Ho's room. Xiang stated that
17 she decided to grow marijuana herself because she needed to earn
18 some money to raise her two-year-old son. Xiang admitted that
19 she grows the marijuana and packages it for sale. Xiang said
20 that she had packaged the marijuana found in the Revere
21 residence the day before. Xiang claimed that she did not have
22 any customers for the packaged marijuana at that time.

23 19. Ho was interviewed and stated that she did not know
24 anything about the marijuana in the house nor the money. Ho
25 disclaimed any ownership interest in the defendant currency.

26 20. Xiang was arrested for state charges related to the
27 cultivation and sale of marijuana.

28 ///

1 21. Based on the above, plaintiff alleges that the
2 defendant currency represents or is traceable to proceeds of
3 illegal narcotics trafficking, or was intended to be used in one
4 or more exchanges for a controlled substance or listed chemical,
5 in violation of 21 U.S.C. § 841 et seq. The defendant currency
6 is therefore subject to forfeiture pursuant to 21 U.S.C.
7 § 881(a)(6) and 18 U.S.C. § 981(a)(1)(C).

8 WHEREFORE, the United States prays that due process issue
9 to enforce the forfeiture of the defendant currency, due notice
10 be given to all interested parties to appear and show cause why
11 forfeiture should be not be decreed, that this court decree
12 forfeiture of the defendant currency to the United States of
13 America for disposition according to law, and for such other and
14 further relief as this court may deem just and proper, together
15 with the costs and disbursements of this action.

16 DATED: September 17, 2012

ANDRÉ BIROTTE JR.

United States Attorney

ROBERT E. DUGDALE

Assistant United States Attorney

Chief, Criminal Division

STEVEN R. WELK

Assistant United States Attorney

Chief, Asset Forfeiture Section



P. GREG PARHAM

Assistant United States Attorney

Asset Forfeiture Section

Attorneys for Plaintiff

United States of America

VERIFICATION

I, Ronald E. Vogelsang, hereby declare that:

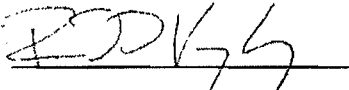
1. I am a Task Force Officer with the Drug Enforcement Administration and am the case agent for the forfeiture matter entitled United States v. \$371,669.00 in U.S. Currency.

2. I have read the above Verified Complaint for Forfeiture and know its contents. It is based upon my own personal knowledge and reports provided to me by other law enforcement officers.

3. Everything contained in the Complaint is true and correct, to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 17th, 2012 in Riverside, California.



Ronald E. Vogelsang

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Philip S. Gutierrez and the assigned discovery Magistrate Judge is Andrew J. Wistrich.

The case number on all documents filed with the Court should read as follows:

CV12- 7999 PSG (AJWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☐ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

COPY

I (a) PLAINTIFFS (Check box if you are representing yourself ☐)
UNITED STATES OF AMERICA**DEFENDANTS**
\$371,669.00 IN U.S. CURRENCY**(b) County of Residence of First Listed Plaintiff** (Except in U.S. Plaintiff Cases):
Los Angeles**County of Residence of First Listed Defendant** (In U.S. Plaintiff Cases Only):
Los Angeles**(c) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
ANDRÉ BIROTTE JR., United States Attorney
P. GREG PARHAM, Assistant United States Attorney
United States Attorney's Office, California Bar No. 140310
U.S. Courthouse, 14th Floor, 312 N. Spring Street, Los Angeles, CA
90012, Telephone: (213) 894-6528, Facsimile: (213) 894-7177**Attorneys** (If Known)**II. BASIS OF JURISDICTION** (Place an X in one box only.)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant.)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No (Check 'Yes' only if demanded in complaint.)**CLASS ACTION** under F.R.C.P. 23: ☐ Yes ☒ No**MONEY DEMANDED IN COMPLAINT:** \$**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
21 U.S.C. Section 881(a)(6) and 18 U.S.C. Section 981(a)(1)(C)**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL PROPERTY	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 710 Fair Labor Standards Act
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 530 General Habeas Corpus	<input type="checkbox"/> 720 Labor/Mgmt. Relations
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 740 Railway Labor Act
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 790 Other Labor Litigation
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 810 Selective Service	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	FORFEITURE / PENALTY	PROPERTY RIGHTS
<input type="checkbox"/> 850 Securities/Commodities /Exchange	<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 891 Agricultural Act	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 630 Liquor Laws	SOCIAL SECURITY
<input type="checkbox"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 895 Freedom of Information Act	<input type="checkbox"/> 220 Foreclosure		<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 660 Occupational Safety /Health	<input type="checkbox"/> 863 DIWC/DIWW (405(g))
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 230 Rent Lease & Ejectment			<input type="checkbox"/> 690 Other	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 240 Torts to Land				<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 245 Tort Product Liability				FEDERAL TAX SUITS
	<input type="checkbox"/> 290 All Other Real Property				<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
					<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s):

FOR OFFICE USE ONLY: Case Number: CV12-7999

CV12-7999

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

AFTER COMPLETING THE FRONT SIDE OF FORM JS-44C, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Appear to arise from the same or substantially identical transactions, happenings, or events;
☐ B. Involve the same or substantially the same parties or property;
☐ C. Involve the same patent, trademark or copyright;
☐ D. Call for determination of the same or substantially identical questions of law, or
☐ E. Likely for other reasons may entail unnecessary duplication of labor if heard by different judges.

IX. VENUE: List the California County, or State if other than California, in which **EACH** named plaintiff resides (Use an additional sheet if necessary)☒ Check here if the U.S. government, its agencies or employees is a named plaintiff.

Los Angeles

List the California County, or State if other than California, in which **EACH** named defendant resides. (Use an additional sheet if necessary).☐ Check here if the U.S. government, its agencies or employees is a named defendant.

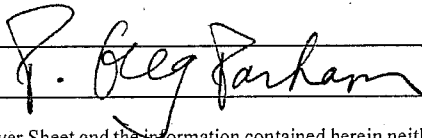
Los Angeles

List the California County, or State if other than California, in which **EACH** claim arose. (Use an additional sheet if necessary)

Note: In land condemnation cases, use the location of the tract of land involved.

Los Angeles

X. SIGNATURE OF ATTORNEY (OR PRO PER):



Date September 17, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))